

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

WILLIAM D. CARLTON,

Defendant.

No. 2:24-cv-01542-RSM

STIPULATED MOTION AND
[PROPOSED] ORDER TO SEAL

NOTE ON MOTION CALENDAR:
AUGUST 15, 2025

Pursuant to Local Civil Rule 5(g), Plaintiff Securities and Exchange Commission and Defendant William D. Carlton (the “Parties”) stipulate as follows:

1. Defendant’s Unopposed Motion to Amend Scheduling Order (Dkt. 17) (the “Motion to Amend”) contains information that should remain under seal.

2. The legal authority and factual basis for sealing the Motion to Amend are explained in that motion and are incorporated here by reference.

3. Reciting that authority here would necessarily reveal information that should remain under seal.

4. This Court has authority to seal documents if “(1) [sealing] serves a compelling interest; (2) there is a substantial probability that, in the absence of [sealing], this compelling interest would be harmed; and (3) there are no alternatives to [sealing] that would adequately protect the public interest.” *United States v. Doe*, 870 F.3d 991, 998 (9th Cir. 2017) (internal

quotation marks and citation omitted); *see also United States v. Parson*, No. 15-CR-05262-DGE, 2022 U.S. Dist. LEXIS 32842 at *5 (W.D. Wash. Feb. 24, 2022).

5. The Parties agree that this standard is met with respect to sealing the Motion to Amend.

For the foregoing reasons, the Parties stipulate and agree that the Motion to Amend Scheduling Order be maintained under seal.

DATED this 15th day of August, 2025.

I certify that this memorandum contains 202 words, in compliance with the Local Civil Rules.

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Attorneys for Plaintiff

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2 IT IS SO ORDERED.

3 Dated this ____ day of August, 2025.
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The Honorable Ricardo S. Martinez
7 United States District Judge
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